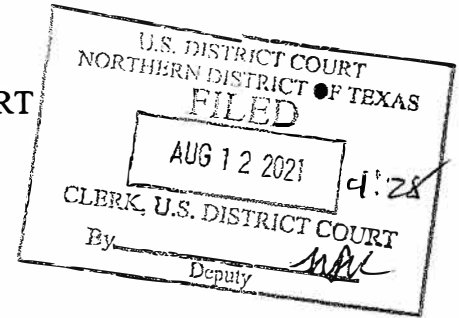


ORIGINAL #FW036761
IN THE UNITED STATES DISTRICT COURT
THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



FATMEH ABDALLAH ESTATE
TAIEL ABDALLAH
Plaintiff,

v.
NASHER ENTERPRISE, LLC TEXAS
NASHER ENTERPRISE, INC CALIFORNIA
BUDNAS PROPERTIES
ZIPCO INC
DOMINIC LAM
Defendant

Case No.

4-21 CV 0958-0

PETITION, CLAIM, AND COMPLAINT IN THE NATURE OF A SUIT FOR
DAMAGES TO PROPERTY AND BUSINESS INTERESTS UNDER
18 USC 1964(a), FOR RACKETEER INFLUENCED
CORRUPT ORGANIZATION ACTIVITY

I. FATMEH ABDALLAH ESTATE AND TAIEL ABDALLAH, hereinafter referred to as "the FATMEH ABDALLAH ESTATE" are residents and homesteaders in Texas who have been deprived of their rural homestead property and the business associated with their homestead property.

II. NASHER ENTERPRISE, BUDNAS PROPERTIES, ZIPCO INC, hereinafter "the racketeers" are persons within the scope of racketeer influenced corrupt organization (RICO) laws who violated RICO laws causing injury to property and business interests of the FATMEH ABDALLAH ESTATE. The racketeers are associated with the enterprises. The racketeers' either participate or have participated in the conduct of the real estate. The participation was through a pattern of racketeering activities resulting in injury to the property and business interests of the FATMEH ABDALLAH ESTATE. The racketeers are connected and bound to the mortgage' enterprise which is a RICO enterprise by reason of records which demonstrate a pattern of activity in violation 18 USC 1961 & 1962. The acts which were committed or aided and abetted by the racketeers were the proximate cause of the FATMEH ABDALLAH ESTATE being defrauded of their rural Texas commercial property and lost profits to their business of

retail store. The frauds committed by the racketeers were reasonably foreseeable or anticipated to result in the financial injury to the FATMEH ABDALLAH ESTATE as a natural consequence. The racketeers pose a threat of continued criminal activity. The racketeers whose role was to aid and abet in predicate acts of fraud was knowing, intentional, and reckless. The racketeers committed or abetted more than two predicate acts rising to a pattern of racketeering; the racketeers directly participate in the conduct of the real estate' enterprise as so-called "officers" of the enterprise. The enterprises' activities affect interstate commerce. The racketeers committed or abetted frauds which were part of a scheme of fraud that would have the foreseeable result of financial injury to the FATMEH ABDALLAH ESTATE property and business interests. The racketeers criminal conduct was merely a footnote in a long history of activities which enable persons like the racketeers to obtain interest in and maintain control of the real estate' enterprise. Without exception, the racketeers had actual knowledge of the falsity of their actions and acted with intent to defraud. Even those aiding and abetting shall be shown to be willfully blind to criminal acts and exhibiting a conscious, reckless disregard for the FATMEH ABDALLAH ESTATE' interests.

Affidavit of TAIEL ABDALLAH

I, TAIEL ABDALLAH, of lawful age and competent to testify, after being first duly sworn, state as follows based on my own personal knowledge:

1. On January 30, 2004, ZIPCO INC. filed a WARRANTY DEED as the GRANTOR and DOMINC LAM GRANTEE, but my mother Fatmeh Abdallah moved back to Jordan in October 2003 and was living there and never sold or gave them permission. **Exhibit A** The legal description of the property:

Lot 6 & 7, Block 49, Fostepco Subdivision the City of Fort Worth, Tarrant County, Texas, located at 3401 Decatur Ave., Fort Worth, Texas 76206
2. On March 17, 2004, ZIPCO INC. filed a QUIT CLAIM as the GRANTOR and said it was from my mother Fatmeh Abdallah as GRANTEE, but my mother was

moved back to Jordan in October 2003 and was living there and never sold or gave them permission. **Exhibit B** The legal description of the property:

Lot 7-B, Block 12, Trueland, an addition to the City of Fort Worth, Tarrant County, Texas, according to the Plat recorded in Vol. 388-208, page 32 Deed Records of Tarrant County, Texas

3. On February 22, 2009, BudNas Properties filed a WARRANTY DEED as GRANTOR and NASHER ENTERPRISE, INC. as GRANTEE, this was fraud because he did not have legal right as GRANTOR, my mother moved back to Jordan in October 2003 and was living there and never sold or gave them permission to anyone to take her property. **Exhibit C** The legal description of the property:

Lot 6 & 7, Block 49, Fostepco Subdivision the City of Fort Worth, Tarrant County, Texas, located at 3401 Decatur Ave., Fort Worth, Texas 76206

4. On November 5, 2012, NASHER ENTERPRISE, INC A California Corporation filed a WARRANTY DEED as GRANTOR and NASHER ENTERPRISE, LLC A Texas Limited Liability Company as GRANTEE, this was fraud because he did not have legal right as GRANTOR, my mother moved back to Jordan in October 2003 and was living there and never sold or gave them permission to anyone to take her property. **Exhibit D** The legal description of the property:

Lot 6 & 7, Block 49, Fostepco Subdivision the City of Fort Worth, Tarrant County, Texas, located at 3401 Decatur Ave., Fort Worth, Texas 76206

5. Dominic Lam on January 30, 2004, at Fort Worth, Texas, committed fraud by advancing a writing which he signed which he knew was false with the intent that I and others rely on the writing to injure me by depriving me of property and business interests.
6. ZIPCO INC, on March 17, 2004, at Fort Worth, Texas, committed fraud by advancing a writing which he signed which he knew was false with the intent that I and others rely on the writing to injure me by depriving me of property and business interests.
7. BudNas Properties, INC., on February 22, 2009, at Fort Worth, Texas, committed fraud by advancing a writing which he signed which he knew was false with the intent that I and others rely on the writing to injure me by depriving me of property and business interests.
8. NASHER ENTERPRISE, on November 5, 2012, at Fort Worth, Texas, committed fraud by advancing a writing which he signed which he knew was false with the intent that I and others rely on the writing to injure me by depriving me of property and business interests
9. At all times, dealing with all those I have named, it made perfectly clear to me that all of them were part of an enterprise which had no sense of morality, decency, fair play, or ethics whatsoever. All openly and arrogantly proclaim themselves to be false actors operating outside the law.
10. The damages to my property and business interests is at least six million two hundred fifty thousand dollars (\$6,250,000.00).

10. The damages to my property and business interests is at least six million two hundred fifty thousand dollars (\$6,250,000.00).

1404 Ravenwood Dr.
Arlington TX 76013

Taiel Abdallah

TAIEL ABDALLAH

STATE OF TEXAS

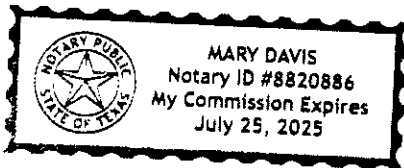
INDIVIDUAL ACKNOWLEDGMENT

COUNTY OF TARRANT

Before me, the undersigned, a Notary Public in and for said County and State on this 7th day of August, 2021, personally appeared TAIEL ABDALLAH to me known to be the identical person who executed the within and foregoing instrument and acknowledged to me that he executed the same as his free and voluntary act.

Given under my hand and seal the day and year last above written.

My commission expires 7-25-2025 Mary Davis Notary Public



EXHIBIT

A

IMAGE

SUMMARY

< Prev Doc | Next Doc >

1 of 2

Add To Cart

NOTICE OF CONFIDENTIALITY RIGHTS: IF YOU ARE A NATURAL PERSON, YOU MAY REMOVE OR STRIKE ANY OF THE FOLLOWING INFORMATION FROM THIS INSTRUMENT BEFORE IT IS FILED FOR RECORD IN THE PUBLIC RECORDS: YOUR SOCIAL SECURITY NUMBER OR YOUR DRIVER'S LICENSE NUMBER.

WARRANTY DEED

STATE OF TEXAS
COUNTY OF TARRANT

KNOW ALL MEN BY THESE PRESENTS:

THAT ZIPCO, INC. ("Grantor"), for the sum of TEN AND NO/100 DOLLARS (\$10.00) and other good and valuable consideration paid by the Grantee named below, the receipt and sufficiency of which are acknowledged by Grantor, has GRANTED, SOLD, and CONVEYED, and by these presents does GRANT, SELL, and CONVEY to DOMINIC LAM ("Grantee") the property in Tarrant County, Texas described as follows ("Property"):

Lot 6 & 7, Block 49, Fostepco Subdivision, the City of Fort Worth, Tarrant County, Texas, located at 3401 Decatur Ave., Fort Worth, Texas 76206

TO HAVE AND TO HOLD THE PROPERTY together with all and singular the rights and appurtenances belonging in any way to the Property, to Grantee, his heirs, legal representatives and assigns forever, and Grantor binds themselves and their heirs, legal representatives and assigns to warrant and forever defend all and singular the Property to Grantee, his heirs, legal representatives and assigns against every person lawfully claiming or to claim all or any part of the Property.

Executed this 30th day of January, 2004

DOMINIC LAM
6815 Manhattan Blvd
Suite 205
Fort Worth, TX 76126

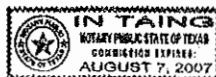
ZIPCO, INC.

By: [Signature]
Dominic Lam, President

ACKNOWLEDGMENT

STATE OF TEXAS
COUNTY OF TARRANT

This instrument was acknowledged before me on January 30th, 2004



Notary Public for the State of Texas

EXHIBIT

B

IMAGE

SUMMARY

< Prev Doc | Next Doc >

1 of 2

6/3
10:4

Added To Cart ▼

04

NOTICE OF CONFIDENTIALITY RIGHTS: IF YOU ARE AN INDIVIDUAL PERSON, YOU MAY REMOVE OR STRIKE ANY OF THE FOLLOWING INFORMATION FROM THIS INSTRUMENT BEFORE IT IS FILED FOR RECORDATION: YOUR SOCIAL SECURITY NUMBER OR YOUR DRIVER'S LICENSE NUMBER.

FILED
TARRANT COUNTY CLERK
SUZANNE ANDERSON

QUITCLAIM

BY

Date: March 17th 2004

Grantor: ZIPCO, INC.

Grantor's Mailing Address: 6815 Manhattan Blvd., Suite 205
Fort Worth, Texas 76120

Grantee: FATMEH ABDALLAH

Grantee's Mailing Address: 6501 Greenspring Drive, Arlington, TX 76016

Consideration: Cash and other good and valuable consideration paid from Grantee's separate property.

Property (including any improvement): Lot 7-B, Block 12, Trueland, an addition to the City of Fort Worth, Tarrant County, Texas, according to the Plat recorded in Vol. 388-208, Page 32, Deed Records of Tarrant County, Texas.

For the Consideration, Grantor quitclaims to Grantee all of Grantor's right, title, and interest in and to the Property, to have and to hold it to Grantee and Grantee's heirs, successors, and assigns forever. Neither Grantor nor Grantor's heirs, successors, or assigns will have, claim, or demand any right or title to the Property or any part of it.

When the context requires, singular nouns and pronouns include the plural.

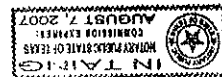
Zipco, Inc.

By

Dominic Lam, President

STATE OF TEXAS)
COUNTY OF TARRANT)

This instrument was acknowledged before me on March 17th, 2004 by Dominic Lam, President of Zipco, Inc., a Texas corporation, on behalf of said corporation.



Notary Public, State of Texas

in Jordan in 2004

EXHIBIT

C

WARRANTY DEED

Date: February 22, 2009

Grantor: BudNas Properties, Inc.,
a Texas corporation

Grantor's Mailing Address:

Post Office Box 1513
Lake Elsinore, Riverside County, CA 92531

Grantee: Nasher Enterprise, Inc.
a California corporation

Grantee's Mailing Address:

Post Office Box 1513
Lake Elsinore, Riverside County, CA 92531

Exceptions to Warranty:

FURTHER, OTHER THAN THE REPRESENTATIONS AND WARRANTIES CONTAINED HEREIN, GRANTOR MAKES NO REPRESENTATIONS OR WARRANTIES, EXPRESS OR IMPLIED, AS TO ANY AND ALL MATTERS PERTAINING TO THE CONDITION OF THE REAL PROPERTY OR IMPROVEMENTS CONVEYED, ITS FITNESS FOR ANY PARTICULAR USE OR PURPOSE, ITS COMPLAINEE WITH ANY LAW, ORDINANCE, RULE OR REGULATION PERTAINING THERETO, NOR AS TO THE PRESENCE OR ANSENCE OF HAZARDOUS SUBSTANCE, CHEMICAL POLLUTIO, HYDROCARBON CONTAMINATION OR ANY OTHER CONDITION WHICH MIGHT HAVE OR MAY IN THE FUTURE CASUSE THE PROPERTY OR ANY PART THEREOF TO BE IN VIOLATION OF ANY FEDERAL, STATE OT LOCAL ENVIRONMENTAL PROTECTION LAW, ORDINANCE, RULE OR REGULATION, THE PROPEY. IN ITS ENTORETY, BEING CONVEYED "AS IS", "WHERE IS" AND "WITHOUT WARRANT."

Reservations from Conveyance:

Easements, rights-of-way, and prescriptive rights, whether of record or not; all presently recorded instruments other than liens and conveyances, covenants, conditions, mineral severances, and reservations that affect the property, and property taxes for the current and subsequent years the payment of which Grantee assumes.

Property (including any improvements):

Lots 6 and 7 Block 49 of Fostepco Heights Addition, an addition to the City of Fort Worth, Tarrant County, Texas, according to the plat thereof recorded in Volume 204-A Page 126, Plat Records of Tarrant County.

Consideration:

The sum of TEN AND 00/100 and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged.

Grantor, for the Consideration and subject to the Reservations from Conveyance and the Exceptions to Conveyance and Warranty, grants, sells, and conveys to Grantee the Property, together with all and singular the rights and appurtenances thereto in any way belonging, to have and to hold it to Grantee and Grantee's heirs, successors, and assigns forever. Grantor binds Grantor and Grantor's heirs and successors to warrant and forever defend all and singular the Property to Grantee and Grantee's heirs, successors, and assigns against every person whomsoever lawfully claiming or to claim the same or any part thereof, except as to the Reservations from Conveyance and the Exceptions to Conveyance and Warranty. When the context requires, singular nouns and pronouns include the plural.

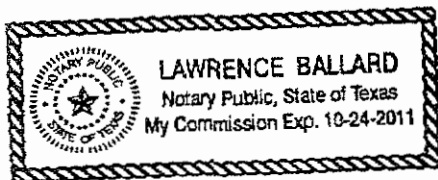
BudNas Properties, Inc.

By: Abdullah Nasher
Abdul Nasher, President

(Corporate Acknowledgment)

STATE OF TEXAS
COUNTY OF DALLAS

This instrument was acknowledged before me on April 14, 2009, by Abdullah Nasher, of BudNas Properties, Inc., a corporation, on behalf of said corporation.



Sara Ballard
Notary Public, State of Texas
My commission expires on:

10-24-2011



TEXESCROW
13101 PRESTON RD #501

DALLAS TX 75240

Submitter: TEXESCROW

SUZANNE HENDERSON
TARRANT COUNTY CLERK
TARRANT COUNTY COURTHOUSE
100 WEST WEATHERFORD
FORT WORTH, TX 76196-0401

DO NOT DESTROY
WARNING - THIS IS PART OF THE OFFICIAL RECORD.

Filed For Registration: 05/06/2009 11:41 AM
Instrument #: D209120682
WD 3 PGS \$20.00

By: _____



D209120682

ANY PROVISION WHICH RESTRICTS THE SALE, RENTAL OR USE
OF THE DESCRIBED REAL PROPERTY BECAUSE OF COLOR OR
RACE IS INVALID AND UNENFORCEABLE UNDER FEDERAL LAW.

Printed by: CN

EXHIBIT

D

WARRANTY DEED

Date: November 5, 2012

Grantor: Nasher Enterprise, Inc. A California Corporation

Grantor's Mailing Address:

17941 Lost Canyon Rd STE 1 Canyon County, Los Angeles County, CA 91387

Grantee: Nasher Enterprise, LLC. A Texas limited liability Company

Grantee's Mailing Address:

106 N. Denton Tap Rd Ste 210-124 Coppell, Denton County, TX 75019

Exceptions to Warranty:

FUTHER, OTHER THAN THE REPRESENTATIONS AND WARRANTIES CONTAINED HEREIN, GRANTOR MAKES NO REPRESENTATIONS OR WARRANTIES, EXPRESS OR IMPLIED, AS TO ANY AND ALL MATTERS PERTAINING TO THE CONDITION OF THE REAL PROPERTY OR IMPROVEMENTS CONVEYED, ITS FITNESS FOR ANY PARTICULAR USE OR PURPOSE, ITS COMPLAINEE WITH ANY LAW, ORDINANCE, RULE OR REGULATION PERTAINING THERETO, NOR AS TO THE PRESENCE OR ANSENCE OF HAZARDOUS SUBSTANCE, CHEMICAL POLLUTION, HYDROCARBON CONTAMINATION OR ANY OTHER CONITION WHICH MIGHT HAVE OR MAY IN THE FUTURE CAUSE THE PROPERTY OR ANY PART THEREOF TO BE IN VIOLATION OF ANY FEDERAL, STATE OR LOCAL ENVIROMENTAL PROTECTION LAW, ORDINANCE, RULE OR REGULATION, THE PROPERTY. IN ITS ENTIRETY, BEING CONVEYED "AS IS", "WHERE IS" AND "WITHOUT WARRANT."

Reservations from Conveyance:

Easements, rights-of-way, and prescriptive rights, whether of record or not; all presently recorded instruments other than liens and conveyances, covenants, conditions, mineral severances, and reservations that affect the property, and property taxes for the current and subsequent years the payment of which Grantee assumes.

Property (including any improvements):

Lots 6 and 7 Block 49 of Fostense Heights Addition, an addition to the city of Fort Worth, Tarrant county, Texas, according to the plat thereof recorded in Volume 204-A Page 126, Plat Records of Tarrant County.

Consideration:

The sum of TEN and 00/100 and other good and valuable consideration, the receipt and valuable consideration, the receipt and sufficiency of which is hereby acknowledged.

Grantor, for the Consideration and subject to the Reservations from conveyance and the Exceptions to Conveyance and Warranty, grants, sells, and conveys to Grantee the Property, together with all and singular the rights and appurtenances thereto in any way belonging, to have and to hold it to Grantee and Grantee's heirs, successors, and assigns forever. Grantor binds Grantor and Grantor's heirs and successors to warrant and forever defend all and singular the Property to Grantee and grantee's heirs, successors, and assigns against every person whomsoever lawfully claiming or to claim the same or any part thereof, except as to the Reservations from conveyance and the Exceptions to Conveyance and Warranty. When the context requires, singular nouns and pronouns include the plural.

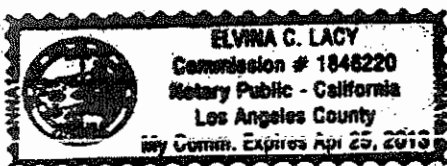
Nasher Enterprise, Inc.

By: Abdullah Nasher
Abdullah Nasher, President

(Corporate Acknowledgment)

**STATE OF CALIFORNIA
COUNTY OF LOS ANGELES**

This instrument was acknowledged before me on Nov. 5, 2012, by Abdullah Nasher, of Nasher Enterprise, Inc., a corporation, on behalf of said corporation.



Elvina C. Lacy
Notary Public, State of California
My commission expires on:
Apr. 25, 2013

MARY LOUISE GARCIA

COUNTY CLERK



100 West Weatherford Fort Worth, TX 76196-0401

PHONE (817) 884-1195

NASHER ENTERPRISE LLC
17941 LOST CANYON RD#1
CANYON COUNTY, CA 91387

Submitter: NASHER ENTERPRISES INC

DO NOT DESTROY
WARNING - THIS IS PART OF THE OFFICIAL RECORD.

Filed For Registration: 11/8/2012 11:36 AM

Instrument #: D212276256

WD

3

PGS

\$20.00

By: _____

Mary Louise Garcia

D212276256

ANY PROVISION WHICH RESTRICTS THE SALE, RENTAL OR USE OF THE DESCRIBED REAL PROPERTY
BECAUSE OF COLOR OR RACE IS INVALID AND UNENFORCEABLE UNDER FEDERAL LAW.

Prepared by: MGSALAZAR

EXH|B|T

E

FATMEH ABDALLAH ESTATE
 1805 AUGUSTA DR
 FORT WORTH, TX 76120
 FIRST DEMAND

Invoice No. 3743

INVOICE

Customer

Name _____
 Address _____
 City _____ State _____ ZIP _____
 Phone _____

Misc

Date 8/6/2021
 Order No. _____
 Rep _____
 FOB _____

Qty	Description	Unit Price	TOTAL
1	FINAL Demand For Payment - ZIPCO INC	\$ 1,250,000.00	\$ 1,250,000.00
1	FINAL Demand For Payment - DOMINIC LAM	\$ 1,250,000.00	\$ 1,250,000.00
1	FINAL Demand For Payment - BUDNAS PROPERTIES	\$ 1,250,000.00	\$ 1,250,000.00
1	FINAL Demand For Payment - NASHER ENTERPRISE INC - CA	\$ 1,250,000.00	\$ 1,250,000.00
1	FINAL Demand For Payment - NASHER ENTERPRISE INC - TX	\$ 1,250,000.00	\$ 1,250,000.00
SubTotal			\$ 6,250,000.00
Shipping			
Tax Rate(s)			
TOTAL			\$ 6,250,000.00

Payment

Select One...

Comments

Name _____
 CC # _____
 Expires _____

Office Use Only

CIVIL COVER SHEET

Case 4:21-cv-00958-O-BP Document 1 Filed 08/12/21 Page 20 of 20 PageID 43

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Fatmeh Abdallah Estate

TARIEL Abdallah TARRANT

(b) County of Residence of First Listed Plaintiff

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

4-21 CV0958-0

DEFENDANTS

Nasher Ent, LLC TX Nasher Ent, INC, CI

BUDNAS PROPERTY

ZIPCO INC

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

RECEIVED

AUG 12 2021

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

☐ 1 U.S. Government Plaintiff☒ 3 Federal Question (U.S. Government Not a Party)☐ 2 U.S. Government Defendant☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Citizen of This State

☒ 1 Incorporated or Principal Place of Business in This State

Citizen of Another State

☐ 2 Incorporated and Principal Place of Business in Another State

Citizen or Subject of a Foreign Country

☐ 3 Foreign Nation

PTF DEF

☐ 4 ☒ 4☐ 5 ☒ 5☐ 6 ☐ 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT		TORTS		FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act	
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))	
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability		<input type="checkbox"/> 424 Copyrights	<input type="checkbox"/> 400 State Reapportionment	
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 370 Other Fraud		<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 410 Antitrust	
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 371 Truth in Lending		<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 430 Banks and Banking	
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage		<input type="checkbox"/> 835 Patent - Abbreviated New Drug Application	<input type="checkbox"/> 450 Commerce	
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 385 Property Damage Product Liability		<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 460 Deportation	
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 355 Motor Vehicle Product Liability			<input type="checkbox"/> 880 Defend Trade Secrets Act of 2016	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations	
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 360 Other Personal Injury			<input type="checkbox"/> 881 HIA (1395ff)	<input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)	
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice			<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 485 Telephone Consumer Protection Act	
<input type="checkbox"/> 195 Contract Product Liability				<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 490 Cable/Sat TV	
<input type="checkbox"/> 196 Franchise				<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 850 Securities/Commodities/Exchange	
				<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 890 Other Statutory Actions	
					<input type="checkbox"/> 891 Agricultural Acts	
					<input type="checkbox"/> 893 Environmental Matters	
					<input type="checkbox"/> 895 Freedom of Information Act	
					<input type="checkbox"/> 896 Arbitration	
					<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision	
					<input type="checkbox"/> 950 Constitutionality of State Statutes	

V. ORIGIN (Place an "X" in One Box Only)

☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

18 USC 1964(a)

Brief description of cause:

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

8/12/2021

Jacqueline Cort for Taniel Abdallah

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE